

**BEFORE THE  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES**

In the Matter of	)	
	)	
FY 2024 Hospital Inpatient Prospective Payment	)	Proposed Rule – CMS-1785-P
System (IPPS) and Long-Term Care Hospital	)	
Prospective Payment System (LTCH PPS)	)	

**Comments of Mobius VP, LLC d/b/a Mobius Vendor Partners**

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## **I. Introduction**

As a global leader in customer feedback management and insight systems, Mobius VP, LLC d/b/a Mobius Vendor Partners<sup>1</sup> (“Mobius”) commends the Centers for Medicare & Medicaid Services (“CMS”) for bringing forth an opportunity to modernize and render more effective the Hospital Consumer Assessment of Healthcare Providers and Systems (“HCAHPS”) survey process. It goes without saying that the HCAHPS survey is a valuable source of data on healthcare effectiveness and efforts to ease participation and quality data collection should be met with excitement. As explained more fully below, Mobius generally supports CMS’ key proposals and looks forward to assisting hospitals in online deployment of the HCAHPS survey should such deployment be authorized.

## **II. Proposals**

### **a. Expanded Modes of Survey Administration**

CMS proposes to allow three new modes of survey administration (web-mail, web-phone, web-mail-phone) beginning with January 2025 discharges. Mobius wholeheartedly supports expanding survey modes to include electronic modalities including website, email, and text messaging. Based on its experience as a turn-key service provider in the customer feedback industry, Mobius believes that electronic modalities will make the HCAHPS survey more attractive to the respondent population, enhance user acceptance, and speed receipt and processing of data inputs thereby significantly improving response rates and survey effectiveness. Electronic deployments will also meaningfully aid in streamlining the data procurement and analysis process while substantially reducing data entry errors and enhancing data security.

Although cost is not the primary driver of the change, one also must recognize that electronic surveys will be much more cost effective in the long run compared to phone or paper surveys. An electronic survey will have initial setup costs, but once up and running, ongoing costs are minimal compared to the staff time needed to conduct phone interviews or input paper survey responses.

### **b. Allowing Proxy Responses**

Currently, the HCAHPS survey may only be completed by the patient. CMS proposes to allow a patient proxy to complete the survey in the patient’s stead. Mobius supports this proposal.

A natural concern with allowing proxy responses is that they may reflect the proxy’s view of the patient’s experience rather than the patient’s actual subjective experience. Mobius believes that this risk should not stand in the way of expanding survey access to the most vulnerable patient populations who are unable to fully complete the survey on their own but whose experiences are likely some of the most beneficial to understand. This will increase overall response rates and the diversity of experiences reflected in the response pool. Of course, patient confidentiality is paramount and the HCAHPS survey invitation should either be sent directly to the patient for the

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<sup>1</sup> Mobius Vendor Partners is an Indianapolis-based provider of customer feedback collection and analysis services. In business for over 20 years, through its proprietary CustomerCount and, HIPAA-compliant, Patients-Count platforms Mobius has served millions of customer surveys and helped numerous healthcare providers, resorts, retailers, and other businesses better understand the experience of their consumers and patients.

patient to provide to the proxy or to proxy directly based on the patient’s consent in a HIPAA-compliant manner.

### **c. Extending Data Collection Period**

CMS proposes to extend the data collection period from 42 days to 49 days. Mobius supports this proposal as it will allow patients, many of whom may be recovering from injury or illness, additional time to respond and thereby increase the overall response rate and capture data that would otherwise go uncollected.

### **d. Requiring Spanish-Language Option**

At this time, the HCAHPS survey is only required to be made available in English.<sup>2</sup> According to the United States Census Bureau, English continues to be the most widely spoken language in the United States but sizeable populations exist of foreign language speakers particularly Spanish, Chinese, Tagalog, Vietnamese, and Arabic speakers.<sup>3</sup> CMS proposes that hospitals track the language the patient speaks, and Mobius believes this data collection effort will provide valuable insights into barriers to healthcare and allow better service of populations of non-English speakers if policymakers and healthcare providers take advantage of the data to implement reforms. As this data is collected, CMS should consider making available additional official translations in commonly spoken languages or mandating their use.<sup>4</sup> Electronic customer feedback platforms, such as the one offered by Mobius, are capable of cost-effectively deploying surveys in multitudes of languages and dialects.<sup>5</sup>

CMS also proposes that if a patient is a Spanish speaker, the official CMS Spanish translation of the HCAHPS survey must be provided to that patient. Mobius agrees with the goal of this directive – ensuring the survey is provided in a language the patient understands – but believes that the patient should be given the option of both versions so that the patient can select the version best aligning with their language preferences or those of their proxy.

### **e. Removal of Interactive Voice Response (“IVR”) and Multi-Site Options**

Mobius agrees with CMS’ proposal to remove IVR and hospitals or hospital systems administering HCAHPS for multiple site options for the same reasons as cited by CMS, namely that they have poor response rates and are an ineffective method of surveying.

## **III. Conclusion**

Mobius appreciates the opportunity to lend its support to CMS’ proposals to make the HCAHPS survey more inclusive, modern, and effective. By taking steps to ease survey deployment (e.g., electronic modalities), response (e.g., proxy completion), and availability (e.g., multiple languages), CMS will ensure higher quality data from a broader response pool.

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<sup>2</sup> Depending on survey method, HCAHPS surveys may be available in English, Spanish, Chinese, Russian, Vietnamese, Portuguese, or German. <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HospitalQualityInits/HospitalHCAHPS> (last accessed May 18, 2023)

<sup>3</sup> <https://www.census.gov/library/stories/2022/12/languages-we-speak-in-united-states.html> (last accessed May 17, 2023)

<sup>4</sup> CMS should also consider ways to make the HCAHPS survey more accessible to those with hearing or visual impairments.

<sup>5</sup> By way of example, Mobius currently can deploy hosted surveys in more than 40 languages.